

- Alternative 3 is also deficient for the reasons set forth in the section above entitled “*Problems associated with all proposed USFS Alternatives.*”

4. Deficiencies in USFS Alternative #4

- It violates applicable law. As set forth in the USFS Chief’s decision: “the Regional Forester’s decision to continue to exclude boating on a portion of the Chattooga WSR above Highway 28 is not consistent with the direction in Section 10(a) of the WSRA or Sections 2(a) and 4(b) of the Wilderness Act or agency regulations implementing these Acts.”
- This alternative totally bans boating on the Rock Gorge, Delayed Harvest, and private reaches – making it wholly unacceptable. There is no justification for these boating bans whatsoever, and no evidence that there is a zero capacity for recreational boating on these reaches.
- The alternative will not support the USFS’s stated desired conditions. By banning one of the primary intended recreational uses on several sections and on most days, the recreation ORV is not protected or enhanced. By eliminating all ORV’s in the upper 1.7 miles of the river the ORV’s are not protected. By eliminating boating, boaters’ personal sense of solitude away from modern life is eliminated. The solitude felt while floating down a river is special and unique for those who seek it out. This alternative has NO protections for solitude because it has no encounter standards, monitoring, or controls. There is NO evidence that the presence of paddlers will significantly impact the solitude of other users in any unique way, and an overwhelming body of evidence that paddlers will not significantly or uniquely impact the solitude of others. The USFS does not provide an adequate wilderness experience for paddlers – whose true Wilderness experience can only be achieved in a boat, at flows and seasons of their choosing, through one of the most low-impact and intimate ways of interacting with nature. The USFS does not provide a true Wilderness experience for any users because boating is a core part of Wilderness where it is possible. The alternative fails to limit or monitor use to assure that Wilderness encounter standards are maintained. Nothing in this alternative protects any of the desired conditions in the uppermost 1.7 miles of the corridor.
- Alternative 4 would continue the 12+ year conflict over the ability of citizens to float the river, and one of the most contentious and costly river recreation management issues in history.
- Alternative 4 has no physical carrying capacity or standards for any user group, except group size for paddlers on 2 of 5 reaches, and is therefore flawed.

- It confuses the issue of restoring boating access by including a random assortment of other management issues.
- Alternative 4 fails to limit or treat wilderness compliant uses equitably.
- Seasonal and water level based closures on this section do not “maximize visitor freedom” as should occur in wilderness areas.
- Alternative 4 fails to implement indirect use limitations prior to implementing harsh direct limits on paddlers.
- Alternative 4 fails to protect any Outstanding Remarkable Values of the uppermost 1.7 miles of the Chattooga River. By banning boating, the alternative eliminates what may be the only option for protecting and enhancing recreation – *or any ORV* - in this reach because recreationists can only enjoy most of this reach by boat due to private property and geographic impediments. We remind the USFS that the Wild and Scenic studies and the congressional intent behind designation clearly intended that Grimshawes Bridge be the put-in for floating down the Chattooga River below that point. Figure 1, from the original USFS WSR studies reflects that fact. Alternative 4 thus fails to follow the congressional intent of designation and the USFS’s own description of the “recreation” ORV in this “recreation” designated river reach. The USFS has the authority and many would argue the obligation to protect the scenic (i.e., riparian areas and other viewshed areas), water quality, and biophysical conditions in this reach.
- Alternative 4 is unnecessarily divisive in that it maintains gross inequities and entitlements.
- Alternative 4 fails to manage frontcountry and backcountry areas differently. The biophysical threats, acceptable biophysical conditions, and management activities differ between designated Wilderness, frontcountry areas, recreation river sections, and wild river sections. This should be factored into any alternative.
- Alternative 4 limits boating to single capacity craft. The USFS has no information that indicates tandem canoes, tandem inflatable kayaks, or 2-4 person rafts are unacceptable on these reaches. This limit is arbitrary.
- Alternatives 4 and 5 limit paddling to four groups per day. The only other alternative is zero groups per day. We expect a broader range of group numbers for analysis.

- This alternative limits floating to only December through March in the Ellicott Rock section. This limit is without basis. It does not prevent overlap with other in-stream river users, and forces paddlers to only enjoy the river on relatively cold, short days.
- This alternative limits paddling the Ellicott Rock section to above 400 cfs at Burrell's Ford. This limit totally eliminates significant boating opportunities without basis, and forces paddlers to explore a river under unnatural constraints that may reduce personal safety.
- The alternatives state that group number will be managed through "self-registration only until records indicate the maximum number of groups is exceeding four; then permits in advance." The alternative fails to mention the number of days per year on which groups exceed four that will actually trigger permits. 1 day per year, 20 days per year, 20 days per year for 3 consecutive years?
- This alternative has a trigger for permits to be required, however offers no details on these permits. We are aware of no other permit system on a small flashy headwater creek run – and cannot envision one that would not result in lost paddling opportunities purely due to delays within the system. The alternative should describe this in greater detail.
- This alternative includes "limited wood removal." We are unsure of what this means but we are concerned. There are ways of responsibly managing wood in rivers to support ecological and recreational values but they are not captured under the title "limited wood removal." We would prefer that two wood alternatives be analyzed, 1) allow natural processes to manage wood (prohibit removal and additions), and 2) actively manage wood to protect and enhance ecological and recreational values. Boating does not require wood removal and alternatives should not infer this.
- Alternatives that allow boating should acknowledge that portaging and scouting may occur in some predictable locations. In these locations, the IR confirms that boaters only exited the river channel once during the expert panel study, and predicts that less than 500 feet of trail would be necessary to support paddling.
- Alternative 4's stated objective is to manage biophysical impacts, yet bans floating on three river reaches while allowing all other uses to go unlimited. This runs counter to all reason. Camping is unlimited yet has demonstrated biophysical impacts noted throughout the IR including ground clearing, vegetation damage, fire risk, soil compaction, erosion, human waste, wildlife attraction, and wildlife disturbance. Hiking and angling is unlimited yet have demonstrated

biophysical impacts including vegetation damage, riparian area clearing, soil compaction, user created trail creation, erosion, human waste, wildlife attraction, and wildlife disturbance. Angling is enhanced through stocking of 70,000 exotic fish which likely has an enormous biophysical impact. Yet, somehow, this alternative limits only floating which has so little biophysical impact that it is anticipated to not even be measurable. This is a radically flawed alternative. How does banning the lowest impact and smallest use while allowing all other uses to exist unlimited and untracked lead to strong biophysical protection? How is the paddling ban part of this alternative? There is simply no logical rationale for including a boating ban in this alternative.

- Alternative 4 would allow some reaches to be floated but would prohibit a complete run of the entire Chattooga River which is a unique 50+ mile multi-day paddling opportunity that is possible nowhere else in the region.
- We fully support the registration of all users in the W&S corridor. This information will be critical in future management decisions.
- Alternative 4 is also deficient for the reasons set forth in the section above entitled “*Problems associated with all proposed USFS Alternatives.*”

5. Deficiencies in USFS Alternative #5

- It violates applicable law. As set forth in the USFS Chief’s decision: “the Regional Forester’s decision to continue to exclude boating on a portion of the Chattooga WSR above Highway 28 is not consistent with the direction in Section 10(a) of the WSRA or Sections 2(a) and 4(b) of the Wilderness Act or agency regulations implementing these Acts.”
- It confuses the issue of restoring boating access by including a random assortment of other management issues.
- We are aware of no reason to ban floating below Lick Log Creek, especially given that congress clearly intended for this use to be protected and enhanced.
- The alternative will not support the USFS’s stated desired conditions. By banning on one reach and at some flows throughout the river, one of the primary intended recreational uses, the recreation ORV is not protected or enhanced. By eliminating all ORV’s except recreation in the upper 1.7 miles of the river the ORV’s are not protected. By eliminating the freedom of paddlers to select their own preferred

flows, their Wilderness experience is damaged. By eliminating boating on one reach, boaters' personal sense of solitude away from modern life is eliminated from that reach. The solitude felt while floating down a river is special and unique for those who seek it out. This alternative has NO protections for solitude because it has no encounter standards, monitoring, or controls for users. There is NO evidence that the presence of paddlers will significantly impact the solitude of other users in any unique way, and an overwhelming body of evidence that paddlers will not significantly or uniquely impact the solitude of others. The alternative fails to limit or monitor use to assure that Wilderness encounter standards are maintained.

- Alternative 5 would continue the 12+ year conflict over the ability of citizens to float the river, and one of the most contentious and costly river recreation management issues in history.
- Alternative 5 has no physical carrying capacity or standards for any user group, except group numbers for paddlers on 2 of 5 reaches, and is therefore flawed.
- Alternative 5 fails to limit or treat wilderness compliant uses equitably as is required by the binding and relevant Record of Decision.
- Alternative 5 fails to implement indirect use limitations prior to implementing the harsh direct limits on paddlers.
- Alternative 5 does protect a portion of one Outstanding Remarkable Value of the uppermost 2 miles of the Chattooga River. We remind the USFS that the Wild and Scenic studies and the congressional intent behind designation clearly intended that Grimshaw's Bridge be the put-in for floating down the Chattooga River below that point. Alternative 5 thus partially follows the congressional intent of designation and the USFS's own description of the "recreation" ORV in this "recreation" designated river reach.
- Alternative 5 is unnecessarily divisive in that it maintains gross inequities and entitlements.
- Alternative 5 fails to manage frontcountry and backcountry areas differently. The biophysical threats, acceptable biophysical conditions, and management activities differ between designated Wilderness, frontcountry areas, recreation river sections, and wild river sections. This should be factored into any alternative.
- Alternative 5 limits boating to single capacity craft. The USFS has no information that indicates tandem canoes, tandem inflatable kayaks, or

2-4 person rafts are unacceptable on these reaches. This limit is arbitrary.

- Alternatives 4 and 5 limit paddling to four groups per day. The only other alternative is zero groups per day. We expect a broader range of group numbers for analysis.
- This alternative limits paddling the river to above 350 cfs at Burrell's Ford. This limit totally eliminates significant boating opportunities without basis, and forces paddlers to explore a river under unnatural constraints that may reduce personal safety.
- The alternatives state that group number will be managed through "self-registration only until records indicate the maximum number of groups is exceeding four; then permits in advance." The alternative fails to mention the number of days per year on which groups exceed four that will actually trigger permits. 1 day per year, 20 days per year, 20 days per year for 3 consecutive years?
- This alternative has a trigger for permits to be required, however offers no details on these permits. We are aware of no other permit system on a small flashy headwater creek run – and cannot envision one that would not result in lost paddling opportunities purely due to delays within the system. The alternative should describe this in greater detail.
- This alternative includes "limited wood removal." We are unsure of what this means but we are concerned. There are ways of responsibly managing wood in rivers to support ecological and recreational values but they are not captured under the title "limited woody debris removal." We would prefer that two wood alternatives be analyzed, 1) allow natural processes to manage wood (prohibit removal and additions), and 2) actively manage wood to enhance ecological and recreational values. Boating does not require wood removal and alternatives should not infer this.
- Alternatives that allow boating should acknowledge that portaging and scouting may occur in some predictable locations. In these locations the Integrated Report confirms that boaters only exited the river channel only once during the expert panel study, and predicts that less than 500 feet of new trails would be needed to support paddling. The boating alternatives should consider construction of these trails if needed, but also acknowledge that they are not necessary.
- This alternative totally bans boating on the bottom section of the Upper Chattooga below Lick Log Creek - making it wholly unacceptable. We are aware of no justification for this boating ban

whatsoever, and no evidence that there is a zero capacity for recreational boating on this reach. Requiring a long hike-out would unnecessarily impact canoeists, and other paddlers unable to carry a boat up the hill for any reason.

- Alternative 5's stated objective is to manage biophysical impacts, yet bans floating on one river reach while allowing all other uses to go unlimited – and in fact attracting other uses through stocking and fishing regulations. This runs counter to all reason. Camping is unlimited yet has demonstrated biophysical impacts noted throughout the IR including ground clearing, vegetation damage, fire risk, soil compaction, erosion, human waste, wildlife attraction, and wildlife disturbance. Hiking and angling is unlimited yet have demonstrated biophysical impacts including vegetation damage, riparian area clearing, soil compaction, user created trail creation, erosion, human waste, wildlife attraction, and wildlife disturbance. Angling is enhanced through stocking of 70,000 exotic fish which likely has an enormous biophysical impact. Yet, somehow, this alternative limits only floating which has so little biophysical impact that it is anticipated to not even be measurable. This is a radically flawed alternative. How does banning the lowest impact and smallest use while allowing all other uses to exist unlimited and untracked lead to strong biophysical protection? How is the paddling ban part of this alternative? There is simply no logical rationale for including a boating ban in this alternative.
- Alternative 5 combines the Chattooga Cliff's reach and the Rock Gorge with regards to group numbers, which erroneously assumes paddlers will always run both of these sections together. These should be considered 2 reaches.
- Alternative 5 would allow some reaches to be floated but would prohibit a complete run of the entire Chattooga River which is a unique 50+ mile multi-day paddling opportunity that is possible nowhere else in the region.
- We fully support the registration of all users in the W&S corridor. This information will be critical in future management decisions.
- Alternative 5 is also deficient for the reasons set forth in the section above entitled "*Problems associated with all proposed USFS Alternatives.*"

6. Deficiencies in USFS Alternative #6

- Alternative 6 does not single out paddlers for different treatment than other users (except for group sizes) and is more equitable. This is a

good thing and is consistent with the Record of Decision that is the root of this environmental analysis. However we see no reason or data to suggest different group sizes.

- It confuses the issue of restoring boating access by including a random assortment of other management issues.
- The alternative will not support the USFS's stated desired conditions. By eliminating all ORV's except recreation in the upper 1.7 miles of the river the ORV's are not protected. This alternative has NO protections for solitude because it has no encounter standards, monitoring, or controls. The alternative fails to limit or monitor use to assure that Wilderness encounter standards are maintained.
- Alternative 6 is not divisive and would begin the process of eliminating the senseless conflicts over the Chattooga's management.
- Alternative 6 would end the 12+ year conflict over the ability of citizens to float the river, and one of the most contentious and costly river recreation management issues in history.
- Alternative 6 would allow the entire Chattooga River to be floated and would allow complete runs of the entire Chattooga River which is a unique 50+ mile multi-day paddling opportunity that is possible nowhere else in the region.
- Alternative 6 does protect a portion of one Outstanding Remarkable Value of the uppermost 2 miles of the Chattooga River. We remind the USFS that the Wild and Scenic studies and the congressional intent behind designation clearly intended that Grimshaw's Bridge be the put-in for floating down the Chattooga River below that point. Alternative 6 thus partially follows the congressional intent of designation and the USFS's own description of the "recreation" ORV in this "recreation" designated river reach.
- However, Alternative 6 has no physical carrying capacity or standards for any user group and is therefore flawed.
- Alternative 6 limits boating to single capacity craft. The USFS has no information that indicates tandem canoes, tandem inflatable kayaks, or 2-4 person rafts are unacceptable on these reaches. This limit is arbitrary.
- This alternative includes "limited wood removal." We are unsure of what this means but we are concerned. There are ways of responsibly managing wood in rivers to support ecological and recreational values but they are not captured under the title "limited woody debris

removal.” We would prefer that two wood alternatives be analyzed, 1) allow natural processes to manage wood (prohibit removal and additions), and 2) actively manage wood to enhance ecological and recreational values. Boating does not require wood removal and alternatives should not infer this.

- Alternatives that allow boating should acknowledge that portaging and scouting may occur in some predictable locations. In these locations the Integrated Report confirms that boaters only exited the river channel only once during the expert panel study, and predicts that less than 500 feet of new trails would be needed to support paddling.
- Alternative 6’s stated objective is to manage biophysical impacts and encounters, yet offers not a single capacity or standard for any user group or total use. This runs counter to all reason. Camping is unlimited yet has demonstrated biophysical impacts noted throughout the IR including ground clearing, vegetation damage, fire risk, soil compaction, erosion, human waste, wildlife attraction, and wildlife disturbance. Hiking and angling is unlimited yet have demonstrated biophysical impacts including vegetation damage, riparian area clearing, soil compaction, user created trail creation, erosion, human waste, wildlife attraction, and wildlife disturbance. Angling is enhanced through stocking of 70,000 exotic fish which likely has an enormous biophysical impact. There is a capacity of the Chattooga River to support recreation, and Alternative 6 totally ignores this most basic principle.
- Alternative 6 fails to distinguish between frontcountry and backcountry areas. The biophysical threats, acceptable biophysical conditions, and management activities differ between designated Wilderness, frontcountry areas, recreation river sections, and wild river sections. This should be factored into any alternative.
- We fully support the registration of all users in the W&S corridor. This information will be critical in future management decisions.

C. Deficiencies in the Scoping Document Generally

- The Scoping Document (SD) provides that “Dispersed camping occurs at least 50 feet from lakes and streams to protect riparian areas, 50 feet from trails and ¼ mile from a road on the Andrew Pickens District.”⁹ It says nothing of the other districts, and fails to recognize that according to the Integrated Report, “Of the 97 [camp] sites on the Upper River, about 26 (27%) are within 20 feet of the river,” and that “The median amount of cleared area was 1,000 square feet” for those sites. Therefore, while the

⁹ USFS Scoping Document, Page 2

USFS explanation of their current management indicates protection of the river and management of camping, the reality is quite different. A large number of generally large campsites have been created by users in the riparian corridor without USFS management.

- The SD fails to mention that historical lack of management has resulted in over 19 miles of user created trails in the Upper Chattooga Corridor, which is appalling given that the Headwater is only 21 miles long.¹⁰ Worse yet, these trails have over 90 erosion problems associated with them, and almost 2 miles of the user created trails are within 20 feet of the river.¹¹ Alternative 1 has created this dire situation – and will not remedy it.
- The SD fails to mention that historical management has included stocking of over 70,000 exotic, non-native, fish each year to the Chattooga River. While this action has benefited anglers interested in catching such fish, it may impact anglers that seek native fish, as well as native organisms including macroinvertebrates, fish, salamanders, and spiders.¹² Moreover, such stocking artificially attracts visitor use, which impacts capacity.
- The SD fails to mention that historical management has resulted in rampant litter of which 142 gallons, or 6.7 gallons per river-mile was found while collecting data for the Integrated Report.¹³
- The SD fails to mention the impacts of existing recreational use on fish and wildlife, or the potential impacts of continued unlimited recreational use.¹⁴
- The SD fails to mention that the USFS has little to no data on past or existing recreational use levels, encounters, or competition impacts. Absent these data, one cannot reasonably conclude that encounter and competition impacts are not (or are) occurring.

III. American Whitewater's Proposal

It is simply not feasible to combine the myriad complex management issues currently under consideration by the USFS into one set of integrated alternatives. *See generally, the issue-by-issue organization of the 2004 ROD.* There are so many variables, that it would require hundreds or thousands of alternatives to account for all of the various combinations (as the USFS unsuccessfully attempted to do in only six integrated alternatives).

¹⁰ Integrated Report, Page 42

¹¹ Integrated Report, Page 43

¹² AW Comments on the Integrated Report

¹³ Integrated Report, Page 46

¹⁴ Integrated Report, Page 51-56

American Whitewater proposes that the USFS address important management issues on an issue-by-issue basis, as is the USFS's custom in Land and Resource Management Plans. The USFS should provide sets of alternatives, organized by issue, that relate to other management changes it seeks to include in this NEPA process; for example the location and condition of official and user-created trails and campsites, trash, parking, angling and hiking access, fish stocking and treatment of woody debris.

Below, American Whitewater proposes a set of three alternatives related to the issue of recreational use. These alternatives are essentially identical with the exception of the standards relied upon for management. Thereafter, American Whitewater briefly outlines other potential alternatives on an issue-by-issue basis.

A. American Whitewater's Proposed Alternatives Related to Recreational Use

1. Nationally Consistent River Management Alternative #1 (high encounter standard)¹⁵

- Restore private, self guided boating on the Headwaters.
- Monitor and mitigate existing and ongoing biophysical impacts of recreational use throughout the Wild and Scenic River Corridor. This action includes standard river resource protection and restoration initiatives including fixing erosion problems, closing or formalizing user created trails, and bringing all campsites and trails up to USFS standards.
- Manage river reaches designated as "Scenic" or "Recreation" as frontcountry areas. Manage river reaches designated as "Wild" as backcountry areas. (See Figure 1)
- Create no new river access parking, roads, or trails.
- Require registration of all corridor visitors.
- Educate users on "Leave No Trace" (LNT), low impact encounter protocols, difficulty of floating reaches, rules and regulations, and water level preferences.
- Implement standard boating safety regulations similar to those in force below Woodall Shoals (life jackets, helmets, appropriate craft).

¹⁵ In alternatives 2 through 4, American Whitewater proposes a simple and commonly used method of protecting the river and assuring that biophysical and recreational standards are not exceeded. This basic concept involves implementing a range of protection and restoration initiatives, as well as recreational regulations, and then allowing wilderness compliant uses to occur until one or more standards are exceeded. Use will then be limited as needed through indirect measures first, followed by direct measures as needed.

- Prohibit the use of single chamber inflatable craft in backcountry areas.
- Prohibit commercial floating use on the entire river above Highway 28.
- Construct up to 500 feet of boating portage trails as needed for resource protection, while closing existing user created trails that are actively eroding or causing other impacts.
- Implement congruent group size limits for all uses.

Allow capacities of **frontcountry** areas to be defined passively by parking and camping availability. If or when **backcountry areas** exceed **10 group encounters on more than 5% of days** per year, for 3 consecutive years, initiate *Use Reduction Management*, as follows:

Survey visitors to ensure encounter standards represent actual encounter tolerances. If this is the case, then limit use by indirect measures in those specific areas. If not, adjust standards to reflect user tolerances.

If total use or encounter standard violations are primarily attributable to one or more groups, target indirect efforts at those groups first. Indirect measures may include reducing group sizes, altering stocking or fisheries management, education on alternative recreational opportunities, instituting voluntary temporal, spatial or water level based avoidance periods (ie voluntary closures), changing access areas, and/or changing camping opportunities.

If after 2 full years of implementing aggressive indirect measures, standards are still exceeded in specific frontcountry or backcountry areas, limit use by direct measures in those specific areas. If total use or encounter standard violations are primarily attributable to one or more groups, target efforts at those groups first. The most appropriate direct means of limiting use is the requirement of limited permits for entry by all users or for participation in specific activities in specific areas during specific times as justified.¹⁶

2. Nationally Consistent River Management Alternative #2 (**moderate encounter standard**)

- Restore private, self guided boating on the Headwaters.
- Monitor and mitigate existing and ongoing biophysical impacts of recreational use throughout the Wild and Scenic River Corridor. This action includes standard resource protection and restoration initiatives including fixing erosion problems, closing or formalizing user created trails, and bringing all campsites and trails up to USFS standards.

¹⁶ See Exhibit 1 for an example of a permitting system that could be applied to boating if data ultimately demonstrates a need for implementation of direct limits on whitewater boating.

- Manage river reaches designated as “Scenic” or “Recreation” as frontcountry areas. Manage river reaches designated as “Wild” as backcountry areas. (See Figure 1)
- Create no new river access parking, roads, or trails.
- Require registration of all corridor visitors.
- Educate users on “Leave No Trace” (LNT), low impact encounter protocols, difficulty of floating reaches, rules and regulations, and water level preferences.
- Implement standard boating safety regulations similar to those in force below Woodall Shoals (life jackets, helmets, appropriate craft).
- Prohibit the use of single chamber inflatable craft in backcountry areas.
- Prohibit commercial floating use on the entire river above Highway 28.
- Construct up to 500 feet of boating portage trails as needed for resource protection, while closing existing user created trails that are actively eroding or causing other impacts.
- Implement congruent group size limits for all uses.

If or when individual **frontcountry** areas meet or exceed **parking and/or camping capacity on more than 10% of days** per year, for 3 consecutive years, limit use by indirect measures in those specific areas. If or when **backcountry areas** exceed **6 group encounters on more than 5% of days** per year, for 3 consecutive years, initiate *Use Reduction Management*, as follows:

Survey visitors to ensure encounter standards represent actual encounter tolerances. If this is the case, then limit use by indirect measures in those specific areas. If not, adjust standards to reflect user tolerances.

If total use or encounter standard violations are primarily attributable to one or more groups, target indirect efforts at those groups first. Indirect measures may include reducing group sizes, altering stocking or fisheries management, education on alternative recreational opportunities, instituting voluntary temporal, spatial or water level based avoidance periods (ie voluntary closures), changing access areas, and/or changing camping opportunities.

If after 2 full years of implementing aggressive indirect measures, standards are still exceeded in specific frontcountry or backcountry areas, limit use by direct measures in those specific areas. If total use or encounter standard violations are primarily attributable to one or more groups, target efforts at those groups first. The most appropriate direct means of limiting

use is the requirement of limited permits for entry by all users or for participation in specific activities in specific areas as justified.¹⁷

3. Nationally Consistent River Management Alternative #3 (low encounter standard)

- Restore private, self guided boating on the Headwaters.
- Monitor and mitigate existing and ongoing biophysical impacts of recreational use throughout the Wild and Scenic River Corridor. This action includes standard resource protection and restoration initiatives including fixing erosion problems, closing or formalizing user created trails, and bringing all campsites and trails up to USFS standards.
- Manage river reaches designated as “Scenic” or “Recreation” as frontcountry areas. Manage river reaches designated as “Wild” as backcountry areas. (See Figure 1)
- Create no new river access parking, roads, or trails.
- Require registration of all corridor visitors.
- Educate users on “Leave No Trace” (LNT), low impact encounter protocols, difficulty of floating reaches, rules and regulations, and water level preferences.
- Implement standard boating safety regulations similar to those in force below Woodall Shoals (life jackets, helmets, appropriate craft).
- Prohibit the use of single chamber inflatable craft in backcountry areas.
- Prohibit commercial floating use on the entire river above Highway 28.
- Construct up to 500 feet of boating portage trails as needed for resource protection, while closing existing user created trails that are actively eroding or causing other impacts.
- Implement congruent group size limits for all uses.

If or when individual **frontcountry** areas meet or exceed **parking and/or camping capacity on more than 5% of days** per year, limit use by indirect measures in those specific areas. If or when **backcountry areas** exceed **2 group encounters on more than 5% of days** per year, for 3 consecutive years, initiate *Use Reduction Management*, as follows:

¹⁷ See Exhibit 1 for an example of a permitting system that could be applied to boating if data ultimately demonstrates a need for implementation of direct limits on whitewater boating.

Survey visitors to ensure encounter standards represent actual encounter tolerances. If this is the case, then limit use by indirect measures in those specific areas. If not, adjust standards to reflect user tolerances.

If total use or encounter standard violations are primarily attributable to one or more groups, target indirect efforts at those groups first. Indirect measures may include reducing group sizes, altering stocking or fisheries management, education on alternative recreational opportunities, instituting voluntary temporal, spatial or water level based avoidance periods (ie voluntary closures), changing access areas, and/or changing camping opportunities.

If after 2 full years of implementing aggressive indirect measures, standards are still exceeded in specific frontcountry or backcountry areas, limit use by direct measures in those specific areas. If total use or encounter standard violations are primarily attributable to one or more groups, target efforts at those groups first. The most appropriate direct means of limiting use is the requirement of limited permits for entry by all users or for participation in specific activities in specific areas as justified.¹⁸

B. Basis for USFS Inclusion of American Whitewater's Proposed Alternatives:

- It will protect both the Headwaters itself and the experience of visitors to that resource
- It is equitable and fair
- It will promptly begin easing tensions between user groups
- It is administratively and legally defensible assuming there is support for the standards selected, and will thus save time and money for all involved.
- It is consistent with proven river management on other rivers nationwide.
- It is consistent with USFS policy, the Wild and Scenic Rivers Act, and the Wilderness Act.
- It is consistent with the USFS Chief's administrative appeal decision directing the USFS in this process
- It treats problems that currently exist, and provides a formula for dealing with issues that could arise in the future.
- It is inexpensive, easy, and straightforward to implement.
- It is flexible to highly variable flows, seasons, and other factors.

¹⁸ See Exhibit 1 for an example of a permitting system that could be applied to boating if data ultimately demonstrates a need for implementation of direct limits on whitewater boating.